

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>

Liquidating Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

**NOTICE OF APPEAL**

PLEASE TAKE NOTICE that Appellants, Pacific Investment Management Company LLC and PIMCO Investments LLC (the “PIMCO Parties”), by and through their undersigned counsel, pursuant to 28 U.S.C. § 158(a), Rules 8001, 8002, and 8003 of the Federal Rules of Bankruptcy Procedure, and Rule 8003-1 of the Local Rules for the United States Bankruptcy Court for the District of Delaware, hereby appeal to the United States District Court for the District of Delaware the Bankruptcy Court’s December 27, 2023 *Memorandum Opinion* [D.I. 1087] (the “Opinion”) and *Order Denying Motion To Enforce Plan Injunction* [D.I. 1088] (the “Order”), and, without limitation, any and all findings of fact and conclusions of law, orders, judgments, decrees, decisions, rulings, and opinions that may be entered with respect to the Opinion and Order. Copies of the Opinion and Order are attached hereto as **Exhibit A** and **Exhibit B**. This Notice of Appeal is also accompanied by the prescribed fee.

PLEASE TAKE FURTHER NOTICE that the names of all parties to the judgment, order, or decree from which the Appellants appeal, and the names, addresses, and telephone numbers of their counsel are as follows:

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number in the jurisdiction were: First Guaranty Mortgage Corporation (“FGMC”) (9575); and Maverick II Holdings, LLC (“Maverick”) (5621). The service address for FGMC is 13901 Midway Road, Ste. 102-334, Dallas, Texas 75244.

Party	Counsel
Appellants (the PIMCO Parties)	<p>Robert J. Stearn, Jr. (No. 2915)  Zachary J. Javorsky (No. 7069)  RICHARDS, LAYTON &amp; FINGER P.A.  One Rodney Square  920 N. King Street  Wilmington, DE 19801  Telephone: 302-651-7700  Email: stearn@rlf.com  javorsky@rlf.com</p> <p>-and-</p> <p>SCHULTE ROTH &amp; ZABEL LLP  Peter H. White  Noah N. Gillespie  555 13th Street NW, Suite 6W  Washington, DC 20004  Telephone: 202.729.7476  Email: pete.white@srz.com  noah.gillespie@srz.com</p> <p>(Admitted <i>Pro Hac Vice</i>)</p> <p>-and-</p> <p>Kristine Manoukian (No. 5509)  Kelly V. Knight (Admitted <i>Pro Hac Vice</i> )  Paulina Piasecki (Admitted <i>Pro Hac Vice</i>)  919 Third Avenue  New York, NY 10022  Telephone: 212.756.2466  Email: kristine.manoukian@srz.com  kelly.knight@srz.com  paulina.piasecki@srz.com</p>
Appellees (Relator, Kari Crutcher)	<p>R. Stephen McNeill (No. 5210)  Jesse L. Noa (No. 5973)  Andrew L. Brown (No. 6766)  POTTER ANDERSON &amp; CORROON LLP  1313 N. Market Street, 6th Floor  Wilmington, Delaware 19801  Telephone: (302) 984-6000  Email: jnoa@potteranderson.com  rmcneill@potteranderson.com  abrown@potteranderson.com</p>

	<p>-and-</p> <p>J. Nelson Thomas, Esquire Jonathan W. Ferris, Esquire THOMAS &amp; SOLOMON LLP 693 East Avenue Rochester, New York 14607 Telephone: (585) 272-0540 Email: nthomas@theemploymentattorneys.com jferris@theemploymentattorneys.com</p> <p>-and-</p> <p>Samuel J. Buffone, Jr., Esquire BLACK &amp; BUFFONE PLLC 1400 Eye St. NW Suite 200 Washington, D.C. 20005 Telephone: (202) 997-8562 Email: Sam@blackandbuffone.com</p> <p>-and-</p> <p>Chelsea Ireland Morgan Greene COHEN ZIFFER FRENCHMAN &amp; MCKENNA 1325 Avenue of the Americas New York, NY 10019 Telephone: (212) 584-1890 Email: cireland@cohenziffer.com mgreene@cohenziffer.com</p>
The United States Trustee for the District of Delaware	<p>Benjamin A. Hackman United States Department of Justice Office of the United States Trustee J. Caleb Boggs Federal Building 844 King Street, Suite 2207, Lockbox35 Wilmington, Delaware 19801 Phone: (302) 573-6491 Fax: (302) 573-6497 Email: Benjamin.A.Hackman@usdoj.gov</p>

Dated: December 29, 2023

/s/ Robert J. Stearn, Jr.

Robert J. Stearn, Jr. (No. 2915)  
Zachary J. Javorsky (No. 7069)  
RICHARDS, LAYTON & FINGER P.A.  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801  
Telephone: 302-651-7700  
Email: [stearn@rlf.com](mailto:stearn@rlf.com)  
[javorsky@rlf.com](mailto:javorsky@rlf.com)

-and-

SCHULTE ROTH & ZABEL LLP  
Peter H. White  
Noah N. Gillespie  
555 13th Street NW, Suite 6W  
Washington, DC 20004  
Telephone: 202.729.7476  
Email: [pete.white@srz.com](mailto:pete.white@srz.com)  
[noah.gillespie@srz.com](mailto:noah.gillespie@srz.com)

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919 Third Avenue  
New York, NY 10022  
Telephone: 212.756.2466  
Email: [kristine.manoukian@srz.com](mailto:kristine.manoukian@srz.com)  
[kelly.knight@srz.com](mailto:kelly.knight@srz.com)  
[paulina.piasecki@srz.com](mailto:paulina.piasecki@srz.com)

*Counsel for Pacific Investment  
Management Company LLC and PIMCO  
Investments LLC*